

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
)	No. 2:19-cr-00013
v.)	Chief Judge Crenshaw
)	
GEORGIANNA A.M. GIAMPIETRO)	

**UNITED STATES' RESPONSE TO DEFENDANT'S MOTION IN LIMINE
TO PROHIBIT THE INTRODUCTION OF OPEN-SOURCE MATERIAL RELATED
TO MERCIFUL HANDS AND AL SADAQAH SYRIA AS HEARSAY**

The United States of America, by and through its attorneys, the United States Attorney for the Middle District of Tennessee and the Chief of the Counterterrorism Section of the National Security Division, United States Department of Justice, hereby files this Response to Defendant's Motion in Limine To Prohibit the Introduction of Open-Source Material Related to Merciful Hands and Al Sadaqah Syria as Hearsay (D.E. 322).

In his motion, the defendant challenges the introduction of certain articles on hearsay grounds. Those articles are identified as follows: (1) Open-source article on Merciful Hands from MEMRI; (2) Open-source article on Merciful Hands from SITE Intelligence Group; (3) Open-source articles on Al Sadaqah Syria from Memri and Vimeo; and (4) Two open-source articles on UK women pleading guilty to donating money to Merciful Hands from the Daily Mail Online. The defendant has attached the articles to his pleading. In response, the government submits that it does not intend to introduce the open-source articles specifically identified and attached by the defendant in its case-in-chief at trial, rendering the defendant's motion effectively moot. However, should the defendant at any point during the trial open the door to the admission of any of said articles through her examination of witnesses or presentation of proof, the government reserves the right to address the issue further outside the presence of the jury to further determine admissibility.

WHEREFORE, the Government submits that Defendant's motion in limine to prohibit the introduction of the identified articles should be denied as moot.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2021, I electronically filed one copy of the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a Notice of Electronic Filing to counsel for all defendants in this case.

/s/ Phil Wehby
PHIL WEHBY
Assistant United States Attorney